



284922

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

## I. HEADING

Date: 03/12/99  
Subject: Allied Paper, Kalamazoo Co., Kalamazoo, Michigan  
From: Brad Stimple, U.S. EPA OSC, ERB, Response Section 3

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POLREP Number: POLREP 9

## II. BACKGROUND

Site No.: 059B Start (Mobilization) Date: 8/3/98  
EPA/IAG ID#: DW96947885-01-0 Completion Date: Ongoing  
Response Authority: CERCLA (ERB) Demobilization Date: NA  
CERCLIS No.: MID006007306 NPL Status: Listed - August 1990

## III. SITE INFORMATION

## A. Incident Category

CERCLA incident category: Inactive Production Facility (Paper Mill)

## B. Site Description

## 1. Site Location

The Allied Paper site is an operable unit of a larger NPL Superfund Site known as the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (AP/PC/KR). The 51-acre Allied Paper site is located along Portage Creek in a residential and commercial area within the city limits of Kalamazoo, Kalamazoo County, Michigan. Portage Creek flows into the Kalamazoo River approximately 3-miles downstream. The Kalamazoo River empties into Lake Michigan approximately 80-miles downstream.

Specifically, the Bryant Mill Pond area of the Allied Paper site is the primary focus of the time-critical removal action. Portage Creek flows in a northerly direction through the Bryant Mill Pond area. The mill pond was formed when a dam at Alcott Street was in use and water was impounded to approximately the 790-foot contour interval elevation. The 22-acre Bryant Mill Pond is no longer impounded. What remains is an exposed floodplain containing PCB contaminated residual paper pulp waste, soil and sediment

resulting from mill wastewater discharge to Portage Creek.

(SEE POLREP 1 FOR ADDITIONAL INFORMATION)

## 2. Description of Threat

(SEE POLREP 1 FOR DETAILED INFORMATION)

## C. Preliminary Assessment/Site Inspection Results

(SEE POLREP 1 FOR DETAILED INFORMATION)

# IV. RESPONSE INFORMATION

## A. Situation

### 1. Current Situation

Weather conditions have been typical for this time of year. Several snow events have occurred during the reporting period. Daytime temperatures range from approx. 20 to 45. Frost law restrictions were canceled early this week. Backfill deliveries have returned to normal.

Excavation is complete along the entire west floodplain of Portage Creek. Excavation along the eastern floodplain and the creek bed is nearly complete up to the pinch point. To date, PCB chemical analysis of soil confirmation samples have resulted in an average concentration range of approx. 0.14ppm to 0.50ppm.

Upon completion of east side excavation up to the pinch point, the stretch of Portage Creek diverted in this area will be placed back into it's original channel.

Approximately 30,000 to 40,000 cy of contaminated material must still be removed from the Bryant Mill Pond. This exceeds the original estimate of 100,000 cy of material requiring removal.

### 2. Removal Activities to Date (02/18/99 to 03/12/99)

The following removal activities have taken place during the reporting period:

1.) Approximately 110,000 cubic yards (CY) of PCB contaminated residual paper pulp waste and soil has been excavated from the Bryant Mill Pond and consolidated onsite. As lagoon #6 is nearly full, waste has been being consolidated into #5 and later into #3.

2.) Confirmation sampling, re-excavation of hot spots as necessary, and backfill activities continue.

3.) Received 300 tons of fly ash/kiln dust to solidify waste along southern berm of lagoon #6. The goal was to form a barrier between the waste and the south berm of the consolidation area. Because of ongoing water drainage in this low area, solidification was not effective. Site crews have begun constructing a rock and fill dirt barrier instead.

4.) Surface water sampling and chemical analysis of upstream and downstream

locations continues on an as needed basis. Real-time turbidity monitoring continues on a daily basis.

5.) A draft restoration plan for the Bryant Mill Pond has been generated and submitted for review. Will also submit to MDEQ for review.

6.) Real-time personnel and perimeter air monitoring is being performed and recorded throughout each day. A third round of perimeter, high volume puf air samples have been collected and analyzed for PCBs. Results indicate that the action level was not exceeded for this 3-day event.

7.) Water treatment activities continue on a 24/hr. basis. Approximately 1,200,000 gallons of water have been treated and discharged to date.

8.) As of last week, approximately 200,000 tons of backfill has been imported to the site.

### 3. Enforcement

U.S. EPA and the PRP for the Allied Paper Operable Unit (AP OU), have entered into a CERCLA 122(h) cash-out agreement. Pursuant to the terms of the agreement, the PRP will pay \$7.5 million to fund a U.S. EPA time-critical removal action at the Bryant Mill Pond portion of the AP OU of the AP/PC/KR NPL site. In exchange for the payment, the PRP will receive certain covenants not to sue under CERCLA.

(SEE POLREP 1 FOR DETAILED INFORMATION)

### B. Planned Removal Activities

- \* Excavate contaminated soil and residual paper pulp waste from the Bryant Mill Pond (790 contour).
- \* Transport material to consolidation area. Stabilize and grade waste as necessary.
- \* Perform confirmation sampling. Backfill excavation area.
- \* Dewater excavation area as necessary. Treat water on-site and discharge as necessary.
- \* Perform personnel and perimeter air monitoring throughout project.
- \* Maintain site haul roads and stabilize lagoon slopes as necessary.
- \* Cover consolidation area as appropriate.
- \* Perform restoration activities of the Bryant Mill Pond as appropriate.

### C. Next Steps (for next reporting period)

- \* Continue excavation of east floodplain and creek bed along diversion 2 & 3.
- \* Begin placement of creek back into original channel and final grading activities.
- \* Treat, sample and discharge contaminated water (24/hrs a day).
- \* Continue confirmation sampling and backfill activities.
- \* Complete south berm barrier in lagoon #6.
- \* Generate a dewatering plan for the consolidation areas..

#### D. Key Issues

A quarterly CAC Public Meeting is scheduled for 3/24/99. A technical meeting concerning removal action completion activities between U.S. EPA/U.S. ACE and PRP representatives is to take place 3/31/99.

#### V. COST INFORMATION (approximate totals as of 03/11/99)

	CEILING	COSTS
U.S. ACE (Weston)	\$5,500,000	\$4,545,000
U.S. EPA	\$ 150,000	\$ TBD

#### VI. DISPOSITION OF WASTES

No off-site disposal of waste planned.